

March 28, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, William L. Ball, Vice President Public Policy, submits this notice in the above-captioned proceedings of an ex parte meeting on March 27, 2002, with Jared Carlson, Deputy Chief; David Siehl; and Pat Forster all with the Wireless Telecommunications Bureau Policy Division. The purpose of the meeting was to discuss the December 3, 2002 petition and February 7, 2003 Reply Comments filed by OnStar in the above captioned docket.

OnStar's transition to digital technology was discussed as well as the capabilities of the OnStar system to contact public safety answering points directly and through the OnStar call center. As a part of this discussion, it was noted that OnStar is currently a single transceiver, analog based service in which wireless calling is permitted only if the subscriber has first subscribed to the basic safety and security suite of services including the location-based emergency and automatic airbag deployment/crash notification services.

It was noted that analog is employed because that format permits voice and data to be transmitted on the same call. This capability is required in offering automatic airbag deployment

notification, emergency and other location-based services and that the challenge in transitioning to digital is developing a robust data transport.

It was noted that, as set out in the petition and reply comments, OnStar is not a portable unit or a conventional handset. In this regard, three issues were noted: the unique need of any telematics Phase II solution to be interoperable across networks of all of a telematics service providers' wireless partners' networks; the need to reconcile the use of autonomous GPS with the use of Assisted GPS by CDMA carriers in developing their Phase II solutions; and the unique product lifecycle issues that occur because of telematics being embedded in the electrical architecture of a vehicle. OnStar suggested, as set forth in its pleadings, that collectively these and the location-based emergency and ACN telematics service capability differentiate its situation from the conventional handset around which the current E911 requirements were drafted. OnStar noted that the requested clarification was recommended to be limited to only certain telematics configurations. OnStar also discussed the AFLT capability that it expects to be available when any digital 911 call is placed.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

William L. Ball
Vice President, Public Policy

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